

September 8, 1999

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**DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) - GENERAL WASTE
DISCHARGE REQUIREMENTS FOR BIOSOLIDS LAND APPLICATION**

The Environmental Health Division, as Local Enforcement Agency, reviewed the subject DEIR, and provides the following comments:

- Appendix E, page E-27 states that "...current green waste composting regulations require a setback of at least 300 feet...unless a variance is granted from the local enforcement agency." Also, Chapter 5 (Public Health), page 5-14 states that "...setbacks...have been placed on [compost projects]...by the California Integrated Waste Management Board."
- The 300-foot setback standard referenced in Appendix E was formerly found in Title 14, California Code of Regulations (CCR), Section 17859. Section 17859 was amended by the California Integrated Waste Management Board in approximately 1995, and the 300-foot setback standard was removed at that time. Currently, Title 14 CCR does not provide prescriptive setback standards applicable to composting activities.
- Chapter 5 (Public Health) and Appendix E discuss potential public health risk associated with compost bioaerosol(s), with particular emphasis upon *Aspergillus fumigatus* in Appendix E. The California Department of Health Services (DHS), Environmental Health Investigations Branch, recently released a report on compost bioaerosols entitled "Bioaerosols and Green-Waste Composting in California," dated June 1999.

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To insure that the DEIR contains the most up-to-date information, and to insure that the DEIR is consistent with information provided by DHS on this issue, the compost bioaerosol information presented in the DEIR should be reviewed for consistency with the DHS report, and amended as necessary to achieve consistency.

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(cont)

If you have any questions, please call Darrell Siegrist at 805/654-5038.

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c: Melinda Talent, Land Use Section, EHD
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Responses to Comments from the Ventura County Resources Management Agency

- 15-1. This comment refers to Appendix E of the draft EIR, page E-27, regarding setback requirements which have been amended for composting facilities. Page E-27, paragraph 2 is amended as follows:

The California Integrated Waste Management Board's current green waste composting regulations ~~require a setback of at least 300 feet of the facility's active compost materials areas from any residence, school, or hospital, excluding onsite residences, unless a variance is granted from the local enforcement agency.~~ included in Title 14 of the CCR does not provide prescriptive setback standards applicable to composting activities. A Local Enforcement Agency can establish requirements for any new facility that can mitigate potential impacts to public health based on the local conditions including such factors as ~~More stringent requirements can be applied where there are sensitive receptors; high winds; or other factors related to health risks, such as the health status of the community potentially affected.~~

Addition of this information does not change the previous conclusions regarding impacts to public health or change any proposed mitigation measures.

- 15-2. The June 1999 report was obtained and reviewed. The report entitled "Bioaerosols and Green-Waste Composting in California" reviewed what is known about aerosols from composting operations. The focus was on green waste and did not address biosolids in particular, but noted the importance of considering the feedstock materials being composted. The report confirmed the draft EIR's findings that there did not appear to be an increased risk to healthy populations from exposure to *Aspergillus fumigatus* from composting operations. It did indicate that workers needed to be protected and that studies are needed to assess the impacts of bioaerosols on communities downwind from composting sites.